



## Changes to Permit Based on 401 Certification

City of Ashton  
Permit Number ID-002371-0

A draft National Pollutant Discharge Elimination System (NPDES) permit for the City of Ashton Wastewater Treatment Plant was issued for Public Notice on April 27, 2001. The original comment period was scheduled to close May 29, 2001 but was extended 15 days (to expire June 13, 2001). Public notice of this extension was mailed to interested parties and published on May 28, 2001 in a local newspaper (The Standard Journal).

The Environmental Protection Agency (EPA) did not receive any comments during the public notice period regarding the City of Ashton's draft permit. The Idaho Department of Environmental Quality (IDEQ) issued a final 401 certification dated July 23, 2001. The certification conditions and any changes to the permit are summarized below.

1. **Compliance schedules.** The City of Ashton should be given five years to comply with the new technology-based effluent limits for total residual chlorine. This time will allow the City to make any operational adjustments that are necessary, install a dechlorination system, and/or to monitor surface water to determine if a mixing zone could be established.

**Response.** Idaho's water quality standards, found at IDAPA 58.01.02.400(03), only allow compliance schedules for water quality-based effluent limitations. Because the effluent limitations for total residual chlorine in the draft permit are technology-based (i.e., based on standard operating practices) they are not eligible for a compliance schedule. If non-compliance with the technology-based limits occurs, EPA would be prepared to issue an administrative order containing a reasonable compliance schedule.

2. **Fecal coliform monitoring frequency.** The fecal coliform monitoring frequency should be changed from five samples per week to five samples per month. It is improbable that the city can transport samples to the independent laboratories serving the area on the draft schedule found in the State's Water Quality Standards. These laboratories only provide bacteria testing four days per week and are difficult to reach during the winter due to poor road conditions. In addition, the labor, testing and transportation cost of the five samples per week would be a financial hardship to the City.

**Change to Permit.** Section I.A.1 of the permit has been changed to require fecal coliform sampling five times per month.

